

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALICIA HASLAM,

Plaintiff,

v.

SHUSTER LABORATORIES, INC.,

Defendant.

Civil Action No. 05-10809-RWZ

**JOINT STATEMENT SUBMITTED PURSUANT TO FED. R. CIV. P. 26(f) AND
LOCAL RULE 16.1**

Pursuant to Fed. R. Civ. P. 26(f), Local Rule 16.1 and this Court's Notice, Plaintiff Alicia Haslam and Defendant Shuster Laboratories, Inc. submit this joint statement and proposed pre-trial schedule.

I. Agenda for Scheduling Conference

The parties propose that the agenda for the July 27, 2005 initial scheduling conference include discussion of the following:

- a. Settlement; and
- b. The parties proposed joint discovery plan.

As required under Fed. R. Civ. P. 26(f) and Local Rule 16.1(B), counsel conferred on July 18, 2005 to establish the proposed agenda and pre-trial schedule.

II. Joint Discovery Plan

a. Initial Disclosures

In accordance with Local Rule 26.2(a) and this Court's Order, the parties anticipate completing the disclosure of relevant documents and information as required by Fed. R. Civ. P. 26(a)(1) on or before August 10, 2005.

b. Fact Discovery Deadline

The parties propose that all fact discovery, including depositions, be completed by March 31, 2006.

c. Written Discovery Deadline

The parties propose that written discovery requests to a party be served at any time after the scheduling conference, provided that the party serving such requests has first made the initial disclosures required by Local Rule 26.2(A). All written discovery requests, including requests for admissions under Fed. R. Civ. P. 36, must be served so that responses are due no later than February 15, 2006.

d. Depositions

The parties propose that they may notice and take depositions at any time after the scheduling conference, provided that the party has first made initial disclosures required by Local Rule 26.2(A).

e. Expert Disclosure and Discovery

The parties propose that Plaintiff must designate expert witnesses, if any, and produce expert reports by March 15, 2006, Defendant must designate expert witnesses, if any, and produce expert reports by April 15, 2006, and the depositions of expert witness must be completed by May 31, 2006.

III. Filing of Motions

The parties propose that all amendments to pleadings and joinder of additional parties shall be served no later than December 1, 2005.

The parties propose that any motions under Fed. R. Civ. P. 56 must be filed on or before June 30, 2006, and opposition papers to such motions shall be filed no later than July 31, 2006.

IV. Proposed Conferences with Court and Final Pre-Trial Conference

The parties propose that the Court schedule a status conference in February 2006. The parties also agree to the scheduling of a final pre-trial conference within forty-five (45) days of receipt of a decision of any pending dispositive motions, if dispositive motions are filed.

Otherwise, the parties propose that the final pre-trial conference be scheduled in September 2006.

V. Trial by Magistrate Judge

The parties do not consent to trial by Magistrate Judge at this time.

VI. Compliance with Local Rule 16(D)(3)


Plaintiff's Local Rule 16.1(D)(3) certification has been filed with the Court. Defendant's Local Rule 16.1(D)(3) certification will be filed prior to the scheduling conference.

Respectfully submitted,

ALICIA HASLAM

By her attorneys,

MCLEOD LAW OFFICES, P.C.



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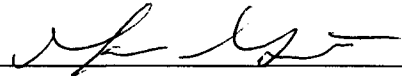
Dated: July 19, 2005

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